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Attorneys for Rabo AgriFinance LLC

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

<p>IN RE:</p> <p>McCLAIN FEED YARD, INC., McCLAIN FARMS, INC. and 7M CATTLE FEEDERS, INC.,</p> <p>Debtors.¹</p>	<p>CASE NO. 23-20084-7-rlj</p> <p>(Jointly Administered Cases)</p> <p>Chapter 7</p>
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¹ The Debtors in these jointly administered Chapter 7 cases are: (a) McClain Feed Yard, Inc. (Case No. 23-20084), (b) McClain Farms, Inc. (Case No. 23-20885) and 7M Cattle Feeders, Inc. (Case No. 23-20886). All three cases are being jointly administered under the case number for McClain Feed Yard, Inc.

**SUPPLEMENT TO RABO’S WITNESS AND EXHIBIT LIST CONCERNING
HEARING ON THE TRUSTEE’S MOTION TO COMPEL [DKT. 268]**

TO THE HONORABLE UNITED STATES BANKRUPTCY COURT:

Rabo AgriFinance LLC (“**Rabo**”), through counsel, respectfully supplements the Witness and Exhibit List it filed on September 9, 2024 [Dkt. 294] concerning the upcoming hearing on the Trustee’s Motion to Compel Production of Documents from Rabo AgriFinance LLC and Focus Management [Dkt. 268] (the “**Motion**”):

ADDITIONAL WITNESSES

The following is the list of the additional witnesses Rabo either will or may call for the Hearing on the Motion:

1. Kent Ries, Chapter 7 Trustee.
2. Glenn Karlberg, CRO of the Debtors at the time of bankruptcy filing.
3. Representative(s) of Focus Management.

ADDITIONAL EXHIBITS LIST

The following constitutes the additional exhibits that Rabo may introduce, refer to, or use at the Hearing on the Motion:

12. Index for Rabo Production RABO-MCCLAIN 00001-034519.
13. Blue Grass Auction Results for April 24, 2023 cattle auction.
14. Lonestar Stockyards Auction Results for April 25, 2023 cattle auction.
15. Form 2 for McClain Farms, Inc. dated September 8, 2023 showing Trustee’s receipt of \$1,638,772.29 from Blue Grass Auctions.

16. Form 2 for McClain Feed Yards dated September 8, 2023 showing Trustee's receipt of \$835,560.05 from Lonestar Stockyards.

17. Amended and Restated Forbearance Agreement.

18. May 2023 emails between Rabo's counsel, Focus Management, the Trustee and other parties regarding the Debtors' records and providing the Trustee and others access to all records.

19. August 2023 emails between Michael Doland of Focus Management and Hudson Jobe, Counsel for Trustee, regarding links to all Debtor records possessed by Focus Management.

Rabo reserves the right to further amend or supplement its Witness and Exhibit List at any time prior to the hearing on the Motion.

DATED this 11th day of September, 2024.

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/s/ Michael R. Johnson

Michael R. Johnson

Attorneys for Rabo AgriFinance LLC

CERTIFICATE OF SERVICE

I hereby certify that on September 11, 2024, the foregoing **SUPPLEMENT TO RABO'S WITNESS AND EXHIBIT LIST CONCERNING HEARING ON THE TRUSTEE'S MOTION TO COMPEL [DKT. 268]** was filed with the Clerk of the Court in the above-entitled case, which sent notice of electronic filing to all electronic filing users in the case.

/s/ Michael R. Johnson

Michael R. Johnson

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